

III. REMARKS

1. Claims 15 and 16 are amended to address noted objections. Claim 11 is amended to correct an error in the language of the claim. Claim 12 is cancelled without prejudice.

2. Claims 1-2, 8, 10-14, 16, 18-24, 27-31 and 33 are not anticipated by Bellamy under 35 U.S.C. §102(e).

In abbreviated terminology, Applicant's invention according to claim 1 defines:

1. A portable coupling device for attaching a mobile phone with a user interface to a television device;
2. That extends the user interface of the mobile phone to the television device.
3. The coupling device has an LPRF receiver to receive information from the MS; and
4. The coupling device has a converter to turn MS signals to signals of the TV.

Bellamy discloses an Enhanced Set Top Box (ESTB) for a particular manner of exchanging information between a TV, PC and remote controller. Contrary to what is stated by the Examiner, the ESTB of Fig. 4 does not have a direct connection with the telephone 2, let alone a "mobile telephone" as is claimed by Applicant. What Bellamy does do is extend a VTIC (modem card) UI from within a PC 10 to a TV with the connection of the ESTB. The telephone 2 is connected with a unidirectional arrow leading to the telephone, without any indication that the telephone 2 would feed back any information to the VTIC 9, not to mention to the ESTB 5. However, the embodiment of Fig. 7 differs in that the VTIC is

built into the ESTB 5 so that the ESTB 5 now presumably can receive information from a telephone line and pass the information to the TV and telephone 2. The connection 15 between the STB and the telephone 2 may be wireless. (see column 9, lines 48-49). Hence, Bellamy might be said to provide a portable coupling device to which a telephone connects wirelessly. However, Bellamy does not disclose or suggest sending information of the mobile phone to the TV via the STB to extend the UI of the MS. Bellamy is focused on providing Internet access using a TV set (see summary of the invention) and as such, contains not a single pointer towards the claimed invention, where a portable coupling device is used to extend the user interface of a mobile phone to the TV. Further, Bellamy does not disclose that the telephone 2 would be a mobile phone. To the contrary, Bellamy clearly discloses using a wired telephone, even if there might be wireless legs replacing normal telephone cords between a PC or STB and the wall socket and between the PC or STB and the normal POTS telephone.

Referring to the citation picked from column 6, line 51 to column 7, line 8, it should be noticed that this citation relates to a paragraph titled "Incoming Telephone Call" and that the process in question is detecting the caller ID from the line by the VTIC and providing the caller ID on a TV. There is no access to the telephone 2 at this phase. Further still, the citation ends by stating that actually, the user selects an option using a button or buttons on ER 3 (remote controller), not the telephone 2. This further confirms that the TV is not used to extend the UI of a mobile phone, but rather that of a PC or to provide one for a device (VTIC) integrated into an STB.

Claim 2 is novel and non-obvious at least by virtue of its dependency upon claim 1.

Claim 11 is amended to correct a mistake. The "attachability" relates to "fixing" the coupling device to the TV device. This feature is intended to mean to fasten, join or connect, to place or fix in position. The term mobile phone is replaced with coupling device to return the intended meaning. That this was always intended is also clear from the fact that the first output belongs to the coupling device, as recited in claim 1.

Claims 16 and 19 to 21 are patentable at least by reason of their dependence on a patentable independent claim. Claim 27 is dissimilar with claim 19, for instance, in that claim 27 provides causing the video display device to simultaneously display mobile phone data and other data. In its context lent by dependence on claim 22, the mobile phone data refers to information originating from the mobile phone and thus definitely excludes any caller ID received from a wall socket by a VTIC.

The citation made on page 5, first paragraph, of the office action; Col. 7, lines 21-25 and col. 8, lines 44-46, disclose that a user may command the VTIC to dial a number using a remote controller ER 3. This is nowhere near to disclosing the conversion and transmission of information from the coupling device to the mobile phone as is recited by Applicant in the claims.

3. Claim 17 is not unpatentable over Bellamy under 35 U.S.C. §103(a) at least by reason of its dependency.

Also, the Examiner states that a "power switch" on devices is notoriously well known. However, as recited in Applicant's invention, the means for turning off circuitry providing

unnecessary functions, to save power when the coupling device is not needed to pass signals from the mobile phone to the television device, clearly functionally specifies the structure of this means so that an ordinary "power switch" cited by the Examiner is not sufficient a source. The Examiner is requested to provide an evidentiary basis for the assertion that this recited feature of Applicant's invention, as described and claimed, was well known.

Claim 7 should at least be allowable by reason of its dependency on claim 1.

Furthermore, there is no motivation to combine Bellamy with Allport as required for 35 U.S.C. §103(a). Allport discloses a base station 75 (Fig. 2) that connects to a TV, external AV signals and the Internet. Allport further discloses that the base station 75 may transmit data to a remote control 10 (column 10, lines 16-18). It is noteworthy that Allport discloses transferring data to a remote controller of particular set-top box type of device. If a person of ordinary skill in the art knowing Bellamy, wanted to improve its operation with Allport, he might have made use of RF communications between the ER 3 and the ESTB 5 to implement the wireless connection, otherwise not specified in Bellamy. While it is easy to suggest that the statutorily imaginable ordinary person would have modified the connection between the telephone 2 and the ESTB 5, there is no motivation given in either Bellamy or Allport to do so. Any suggestion to do so could only occur with hindsight knowledge of Applicant's invention, which is impermissible.

Applicant also traverses the Examiner's suggestion that Bellamy "inherently" is able to obtain information from the first

information signal, as recited by Applicant in claim 7. It is requested that proof be provided to support this assertion.

5. Claims 3, 5 and 25 are not unpatentable over Bellamy in view of Bodle. These claims should be allowable at least in view of their respective dependencies.

6. Claims 1, 3, 4, 6-8, 11-16, 18, 19, 22, 25, 26, 28 and 32 are not unpatentable over Heinonen in view of Allport under 35 U.S.C. §103(a).

Heinonen is said to disclose a coupling device for connecting a mobile phone with a user interface to a television device so as to extend the user interface of the mobile phone to the television device. In fact, Heinonen only discloses using a mobile phone as a modem for accessing telecommunications services and that the application operated by the user runs in an application-specific charger accessory 30. The user instructs the accessory 30 by means of an IR remote controller, see Fig. 3 and its description on column 3, line 42 to column 5, line 5. As with Bellamy and Allport, a special base station device connects to a TV, process applications (or makes use of a coupled PC) and uses its dedicated remote control for user input. The combination of Heinonen and Allport does not result in a portable coupling device for attaching a mobile phone with a user interface of a television device, as is claimed by Applicant.

There is also no motivation to combine Heinonen with Allport. The Examiner argues that Allport would have made it obvious to modify Heinonen's system to include a short range radio as taught by Allport, but yet not like Allport, for the connection of the remote control and the STB but for the link between the mobile station and the accessory 30. This is motivated by the non-

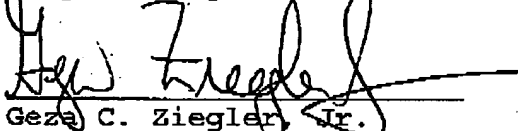
disclosed desire of the ordinarily skilled person to take carry and use the mobile phone in a separate room. One can immediately notice that when separated by a wall, the system of Heinonen is useless as the TV cannot be seen, and that the simultaneous use of the mobile phone would have been prevented by its need for the data communications over the mobile phone and that the accessory 30 was named as a charger accessory 30 in order to be capable of charging and supplying power to the mobile phone during its operation. Thus, one would not combine Heinonen with Allport to achieve Applicant's invention.

As to the short range radio transmitter mentioned in the office action with respect to claim 7, on page 10, the Examiner alleges this to be disclosed in Allport at column 10, lines 9 to 35. We acknowledge that Allport mentions the term "FCC regulated home communications frequencies" which the Examiner presumably takes as an implied transmission power cap such that short range transmitter would be inherent. However, the frequencies given, 900 and 1800 MHz, are those used for cellular phones with powers well beyond those referred to by the claimed term short range communications. For technologies and services that typically operate in the 2 GHz range, the FCC has allocated 140 MHz of space between 1850 MHz and 1990 MHz for broadband PCS and 3 MHz in the 900 MHz auction process that began in 1994 and completed in January 1997 (www.decodesystems.com/pcs.html). Hence, it appears that Allport does not sufficiently set any limit for the power save that it must be large enough to pass through walls. Thus, clearly, the limitations of claims 1, 3, 4, 6-8, 11-16, 18, 19, 21, 25, 26 28 and 32 are not disclosed or suggested.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


Geza C. Ziegler, Jr.
Reg. No. 44,004

20 June 2005
Date

Perman & Green, LLP
425 Post Road
Fairfield, CT 06824
(203) 259-1800 Ext. 134
Customer No.: 2512

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Meaghan Bayle
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